

April 3, 2018

VIA ECF

Honorable Lorna G. Schofield
U.S. District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*,
No. 1:13-cv-07789-LGS (S.D.N.Y.)

Dear Judge Schofield:

In advance of the conference rescheduled for April 11, 2018, Plaintiffs respectfully request the Court amend the Civil Case Management Plan and Scheduling Order (“Operative Order”) (ECF No. 704) with respect to the schedule for class certification and related expert discovery. In their pre-motion conference letter regarding their class certification motion, Plaintiffs requested the Court modify the existing schedule to allow Plaintiffs to serve their class certification motion. (ECF No. 1000). As discussed in the Plaintiffs’ pre-motion letter, Plaintiffs’ opening papers are due on April 19, 2018 and their reply in support of final approval is due on April 23, 2018. Given the significance of those settlements to class members, the additional time will allow Plaintiffs to fully focus their efforts on each brief. The extension will also provide Plaintiffs adequate time to finalize their expert reports.

Plaintiffs originally requested to move all deadlines relating to class certification by three weeks. Having conferred with Credit Suisse’s counsel and taking into account counsel’s calendars, the parties have agreed to the following schedule (original dates are noted in parenthesis):

Class Certification and Related Expert Discovery

- A. Plaintiffs shall serve, but not file, their motion for class certification and any expert reports in support thereof by **May 31, 2018** (original, April 19, 2018) and shall file such motion on **December 6, 2018** (original, October 11, 2018).
- B. Absent agreement of the parties, depositions of Plaintiffs’ experts or other affiants in support of the motion shall be completed by **August 3, 2018** (original, June 29, 2018).
- C. Defendants shall serve, but not file, any opposition to the motion for class certification, any expert reports in support thereof, and any challenges to Plaintiffs’ experts by **September 20, 2018** (original, July 26, 2018) and shall file such opposition (and expert challenges) on **December 6, 2018** (original, October 11, 2018).
- D. Absent agreement of the parties, depositions of Defendants’ experts or other affiants in support of the motion shall be completed by **October 26, 2018** (original, September 14, 2018).

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E. Plaintiffs shall serve and file their reply brief in support of their class certification motion, any reply expert reports, any opposition to any challenge by Defendants to Plaintiffs' experts (Defendants' replies due three (3) weeks after oppositions), and any challenges to Defendants' experts by **December 6, 2018** (original, October 11, 2018) (Defendants' oppositions due three (3) weeks after opening brief and Plaintiffs' replies due three (3) weeks after oppositions). Plaintiffs shall provide a courtesy copy of the class certification motion papers as provided for in the Court's Individual Rules and Procedures for Civil Cases.

Accordingly, Plaintiffs respectfully request the Court enter the above schedule.

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Christopher M. Burke
Christopher M. Burke
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: 619-233-4565

HAUSFELD LLP

/s/ Michael D. Hausfeld
Michael D. Hausfeld
1700 K Street, NW, Suite 650
Washington, DC 20006
Telephone: 202-540-7200

Interim Co-Lead Class Counsel